

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION

VLSI TECHNOLOGY LLC,

Plaintiff,

v.

INTEL CORPORATION,

Defendant.

C.A. Nos. 6:19-cv-00254, -00255, -00256-  
ADA

**DECLARATION OF THOMAS HERRGOTT IN SUPPORT OF  
INTEL CORPORATION'S MOTION TO TRANSFER VENUE**

I, Thomas Herrgott, hereby declare as follows:

1. I am a Controller in the Corporate Planning and Reporting Group at Intel Corporation ("Intel"). In this role, I am responsible for financial forecasting and reporting for Intel's Legal, HR, Finance, and Executive Office budgets. Previously, I have served in a number of manufacturing-focused roles at Intel, most recently as Fab/Sort Manufacturing Roadmap Specialist, where I was responsible for long-range capacity and capital investment strategy for all of Intel's fab manufacturing facilities. In total, I have worked at Intel for 20 years.

2. I submit this declaration in support Intel's Motion to Transfer Venue.

3. The facts set forth in this declaration are based on my own knowledge and on research conducted under my supervision and direction. If sworn as a witness to testify in this matter, I would testify to the facts as set forth herein.

4. Founded in 1968, Intel is a technology company that specializes in the design and development of semiconductor and microprocessor products. Intel employs more than 100,000 people across its 189 facilities worldwide.

5. Intel's worldwide headquarters are in Santa Clara, California, where it currently employs more than 6,600 people.

6. In addition to its Santa Clara campus, Intel has numerous facilities in the United States. One of those facilities is located in Austin, Texas, where Intel currently employs approximately 1,700 people.

7. I understand that the products accused of infringement in these actions are Intel's Broadwell, Skylake, Cannon Lake, and Ivy Bridge processors. I further understand that Plaintiff VLSI Technology LLC accuses the following specific features in these products: Intel's Speed Shift technology or hardware-controlled performance states ("HWP") technology; Intel's Quick Path Interconnect ("QPI") Link Layer; Intel's Advanced Programmable Interrupt Controller ("APIC") with Intel's Power Aware Interrupt Routing ("PAIR) technology; Intel's Fully Integrated Voltage Regulator ("FIVR"); dynamic cache shrink technology; write-assist technology in static random access memory ('SRAM') arrays; and fuses or other non-volatile memory that store information about SRAM minimum voltages.

8. These product features are designed and developed by engineers at Intel facilities in Arizona, Oregon, and Israel.

9. Documents describing the design, development, and manufacture of the accused products, for example technical specifications, are located in Arizona, Oregon, Israel, Washington, and California. No documents related to the accused products are stored in Intel's Austin facility.

10. I understand that Robert Ehrlich, Olga Lowe (fka Lu), and Kevin Locker are each a named inventor of a patent asserted in this litigation. Mr. Ehrlich and Ms. Lowe currently work for Intel in Austin, Texas, and Mr. Locker currently works for Intel in Chandler, Arizona.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on May 17, 2019

  
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Thomas Herrgott  
Controller, General and Administrative  
Intel Corporation